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Co-Lead Counsel for Plaintiffs

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

IN RE: MIDLAND CREDIT  
MANAGEMENT, INC.,  
TELEPHONE CONSUMER  
PROTECTION ACT LITIGATION.

Case No. 11-md-2286 MMA (MDD)

Member Cases: 10-cv-02261  
10-cv-02600  
10-cv-02368  
10-cv-02370

**JOINT MOTION TO CONTINUE  
EXPERT DISCLOSURE,  
DISCOVERY AND CLASS  
CERTIFICATION DEADLINES**

1           The Parties continue to work on finalizing the settlement reached with the  
 2 assistance of mediator Judge Herbert Hoffman (Ret.) and have exchanged drafts of  
 3 the Settlement Agreement. The Parties had a meeting scheduled for January 8,  
 4 2015 to discuss in person the various remaining settlement issues, but that meeting  
 5 was cancelled due to the illness of Plaintiffs' counsel. The parties are scheduled to  
 6 meet in person again on January 20, 2015. The Parties are therefore requesting that  
 7 the approaching existing deadlines in the case be extended approximately 60 days  
 8 to the following:

9           1. All expert disclosures required by Fed.R.Civ.P. 26(a)(2) shall be  
 10 served on all parties on or before March 16, 2015.

11           2. Any contradictory or rebuttal disclosures within the meaning of  
 12 Rule 26(a)(2)(D)(ii) shall be served on all parties on or before April 7, 2015.

13           3. All fact and expert discovery necessary to support or oppose class  
 14 certification shall be completed by April 20, 2014.

15           4. The deadline for filing the motion for class certification shall be  
 16 continued to April 27, 2015.

17           Dated: January 14, 2015  
 18

19           By s/ Edward D. Totino  
 20           WILLIAM S. BOGGS  
 21           EDWARD D. TOTINO  
 22           AMANDA C. FITZSIMMONS  
 23           DLA PIPER LLP (US)

24           RICHARD L. STONE  
 25           AMY M. GALLEGOS  
 26           ETHAN A. GLICKSTEIN  
 27           JENNER & BLOCK LLP

28           Attorneys for Defendants  
 29           Midland Funding LLC, Midland Credit  
 30           Management, Inc., and Encore Capital  
 31           Group

1 Dated: January 14, 2015

2 EDELMAN, COMBS, LATTURNER &  
3 GOODWIN

4 By s/ James O. Latturner  
5 JAMES O. LATTURNER

6

7 **CERTIFICATION OF APPROVAL OF CONTENT**

8 I, Edward D. Totino, counsel for Defendant Midland Funding, LLC, Midland  
9 Credit Management, Inc. and Encore Capital Group, in this matter, hereby certify  
10 that the required parties have approved and accepted the content of the Joint Motion  
11 to Continue Expert Disclosure, Discovery and Class Certification Deadlines, and  
12 that I have obtained authorization from James O. Latturner, counsel for Plaintiff, for  
13 his electronic signature on this Joint Motion.

14 Dated: January 14, 2015

15 By s/ Edward D. Totino  
16 WILLIAM S. BOGGS  
17 EDWARD D. TOTINO  
18 AMANDA C. FITZSIMMONS  
19 DLA PIPER LLP (US)

20 RICHARD L. STONE  
21 AMY M. GALLEGOS  
22 ETHAN A. GLICKSTEIN  
JENNER & BLOCK LLP

23 Attorneys for Defendants  
24 Midland Funding LLC, Midland Credit  
25 Management, Inc., and Encore Capital  
26 Group

## CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 2000 Avenue of the Stars, Suite 400 North Tower, Los Angeles, California, 90067. On January 14, 2015, I served the within document(s):

**JOINT MOTION TO CONTINUE EXPERT DISCLOSURE,  
DISCOVERY AND CLASS CERTIFICATION DEADLINES**

- by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
  - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, for delivery via overnight/express service carrier at San Diego, California addressed as set forth below.
  - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Diego, California addressed as set forth below.
  - by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below on this date before the close of normal business hours.
  - by transmitting via electronic mail a copy of the document(s) listed above in .pdf format, with no transmission errors reported, to the person(s) at the e-mail address(es) denoted on the Electronic Mail notice list.

I hereby certify that on the below date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail notice list.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

I declare that I am employed in the office of a member of the Bar of or  
permitted to practice before this Court at whose direction the service was made.

Executed on January 14, 2015, at Los Angeles, California.

Ann Lojanski